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From: [REDACTED]

Sent: Thursday, March 10, 2022 1:01:59 PM

To: [REDACTED]

Cc: [REDACTED]

Bcc:

Subject: RE: FBAR question

Hi ,

It turns out that corporations do have a FBAR filing requirement. Entities created, organized, or formed under the laws of the United States have an FBAR filing requirement. See 31 CFR 1010.350(b); IRM 4.26.16.2.1.

You've indicated that the corporation under exam was organized in the , but that it made an election under § 953(d) to be treated as a domestic life insurance company. So, the question of whether the corporation has a FBAR filing requirement appears to turn on the effect of that election.

[REDACTED]

Thanks.

Taylor H. Huse

Attorney

CC:PA:02

Direct: (202) 317-5428